

COMSTOCK HOMES DEVELOPMENT AND ELLWOOD MESA OPEN SPACE PLAN FEIR

SECTION 6.0 ALTERNATIVES

Section 6.0 Alternatives

6.1 INTRODUCTION

Section 15126.6(a) of the CEQA Guidelines states that “an EIR shall describe a range of reasonable alternatives to the project...which would feasibly attain most of the basic objectives of the project (note: these are presented as ‘Project Objectives’ in Section 1.0 of this EIR) but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.... There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.”

This section presents a comparative evaluation of the proposed project and alternatives as required by CEQA. Table 6-1 presents a comparison of environmental impacts associated with each Alternative, as compared to the proposed project. An assessment of each alternative’s ability to meet the project objectives is presented in Section 6.3. The Environmentally Superior Alternative is identified in Section 6.4.

It should be noted that the applicant (Comstock Homes) submitted a revised site plan (Comstock Alternate 1) subsequent to preparation of the Draft EIR. The Comstock Alternate 1 site plan is described and evaluated in Master Response L in Appendix E of this Final EIR. The Comstock Alternate 1 site plan would reduce, but not eliminate, many of the impacts associated with the proposed project. The Comstock Alternate 1 site plan evaluated in Master Response L is not the same as Alternative 1 – No Project Alternative evaluated herein in Section 6.0.

The following alternatives are addressed in this section:

- Alternative 1: No Project Alternative
- Alternative 2: Reduced Development Envelope Option A (refer to Figure 6.2-1)
- Alternative 3: Reduced Development Option B (refer to Figure 6.2-2)
- Alternative 4: Reduced Development Option C (refer to Figure 6.2-1)
- Alternative 5: Reduced Development Option D (refer to Figure 6.2-3)
- Alternative 6: Offsite Alternative (refer to Figure 6.2-4)
- Alternative 7: Reduced Open Space Plan Alternative

The following sections provide a description of the seven alternatives under consideration and a comparative analysis of the alternatives with the proposed Comstock Homes Development. Alternative 1 addresses the No Project Alternative. Alternatives 2 through 5 address reduced development options that would lessen environmental effects – primarily to biological resources. Alternative 6 addresses an offsite development alternative. Alternative 7 addresses alternatives to the City of Goleta’s proposed improvements associated with the Ellwood Mesa Open Space

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Section 6.0 Plan. While the analysis included in this EIR complies with the CEQA requirements for an
Alternatives alternatives analysis, it does not fully address the alternatives to a project level of detail. If the City of Goleta should decide to select an Alternative in place of the proposed project, additional environmental review may be required to support project approvals.

As discussed in Sections 3.0 and 4.0, the City of Goleta proposes optional scenarios for open space components within the City's jurisdiction; those optional scenarios (referred to as the Anza Trail optional scenarios 1 and 2, and the Devereux Creek boardwalk option) are not considered alternatives in the context of CEQA Section 15126.6, and are evaluated to a project level of detail in Section 4.0.

6.2 ALTERNATIVES CONSIDERED

6.2.1 Alternative 1: No Project Alternative

6.2.1.1 Description of Alternative 1

This Alternative excludes all residential development on the 36-acre Santa Barbara Shores property. The No Project Alternative, if selected, could result in no residential development on Santa Barbara Shores and no Open Space Plan improvements. One consequence of this Alternative could be development of five dwelling units in the Ellwood Mesa area (i.e., the five legal parcels that comprise the Ellwood Mesa site which are presently owned by the Santa Barbara Development Partnership). Although the five existing legal parcels in the Ellwood Mesa area would need to be reconfigured to accommodate these five dwelling units (i.e., due to the location of these parcels on the beach and bluff zones), the building envelopes for these houses would be designed to minimize impacts to sensitive resources and to avoid hazards identified on Ellwood Mesa. It is assumed that Alternative 1 (No Project Alternative) would involve no Open Space Plan improvements on lands under the City of Goleta's jurisdiction. In addition, under this alternative the proposed land exchange and associated shift of development rights to the north away from the Ellwood Mesa coast to less environmentally sensitive City of Goleta-owned Santa Barbara Shores Park would not occur.

This alternative would require various improvements to be constructed and maintained in order to serve the new dwelling units on Ellwood Mesa, including the following:

- Access road(s) and driveways
- Water supply main and distribution lines
- Municipal sewer interconnection(s)
- Electrical interconnection(s)
- Natural gas supply interconnection(s)
- Telephone and cable television interconnection(s)

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Table 6-1. Comparison of Alternatives to the Proposed Project

Issue Area/Impact	Proposed Project ¹	Magnitude of Impact in Comparison to the Proposed Project ²						
		Alternative 1: No Project Alternative ³	Alternative 2: Reduced Development Envelope Option A	Alternative 3: Reduced Development Envelope Option B	Alternative 4: Reduced Development Envelope Option C	Alternative 5: Reduced Development Envelope Option D	Alternative 6: Offsite Alternative ⁴	Alternative 7: Reduced Open Space Alternative ⁵
Geology and Geologic Hazards								
GEO-1: Change in Topography	Class II	Class II (–)	Class II (–)	Class II (–)	Class II (–)	Class II (–)	Class II (–)	Class II (=)
GEO-2: Erosion	Class II	Class II (–)	Class II (–)	Class II (–)	Class II (–)	Class II (–)	Class II (–)	Class II (=)
GEO-3: Slope Stability	Class III	Class II	Class III (=)	Class III (=)	Class III (=)	Class III (=)	Class III (–)	Class III (=)
GEO-4: Seismic Hazards	Class II	Class II (=)	Class II (=)	Class II (=)	Class II (=)	Class II (=)	Class II (=)	Class II (=)
GEO-5: Expansive Soils	Class II	Class II (=)	Class II (=)	Class II (=)	Class II (=)	Class II (=)	Class II (–)	Class II (=)
GEO-6: Collapsible Soils	Class II	Class II (=)	Class II (=)	Class II (=)	Class II (=)	Class II (=)	Class II (–)	Class II (=)
GEO-7: Change in Topography (Open Space Plan improvements)	Class II	Not applicable	Class II (–)	Class II (–)	Class II (–)	Class II (–)	Not applicable	Class III
GEO-8: Erosion (Open Space Plan improvements)	Class II	Not applicable	Class II (–)	Class II (–)	Class II (–)	Class II (–)	Not applicable	Class II (=)
GEO-9: Slope Stability (Open Space Plan improvements)	Class II	Not applicable	Class II (=)	Class II (=)	Class II (=)	Class II (=)	Not applicable	Class III
GEO-10: Seismic Hazards (Open Space Plan improvements)	Class II	Not applicable	Class II (=)	Class II (=)	Class II (=)	Class II (=)	Not applicable	Class III
GEO-11: Expansive Soils (Open Space Plan improvements)	Class II	Not applicable	Class II (=)	Class II (=)	Class II (=)	Class II (=)	Not applicable	Class III
GEO-12: Collapsible Soils (Open Space Plan improvements)	Class II	Not applicable	Class II (=)	Class II (=)	Class II (=)	Class II (=)	Not applicable	Class III
GEO-13: Cumulative Impacts	Class II	Class II (–)	Class II (–)	Class II (–)	Class II (–)	Class II (–)	Class III	Class II (=)
Hydrology and Water Quality								
H/WQ-1: Impacts to surface hydrology and flooding potential	Class II	Class II (–)	Class II (–)	Class II (–)	Class II (–)	Class II (–)	Class II (–)	Class II (=)
H/WQ-2: Impacts to water quality in Devereux Creek/Slough due to erosion and sedimentation	Class II	Class II (–)	Class II (–)	Class II (–)	Class II (–)	Class II (–)	Class II (=)	Class II (=)
H/WQ-3: Impacts to water quality in Devereux Creek/Slough due to urban runoff from residential development	Class II	Class II (–)	Class II (–)	Class II (–)	Class II (–)	Class II (–)	Class II (=)	Class II (=)

¹ Highest Impact Class identified in impact analyses presented in Section 4.0, where I – significant, unmitigable to less than significant; II = significant, but feasibly mitigated to less than significant; III = adverse, but insignificant; and IV = beneficial impact.

² Key:
+ More adverse impacts than proposed project
= Similar to proposed project
– Fewer adverse impacts than proposed project
B Beneficial impact
X Beneficial impact would not be realized

³ For the purposes of this tabular comparison of alternatives, Alternative 1 (No Project Alternative) is assumed to include development of five dwelling units on Ellwood Mesa (refer to Section 6.2.1), no Land Exchange, and no Open Space Plan improvements on Ellwood Mesa.

⁴ For the purposes of this analysis, Alternative 6 (Offsite Alternative) is assumed to generally correlate to “Site I in the Final EIR for the Sandpiper Golf Course, Clubhouse, Day Care Center, and Residential Development” (County, 1995) (refer to Section 6.2.6 of this EIR for more information).

⁵ Refer to Section 6.2.7 for the details of Alternative 7.

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Table 6-I. Comparison of Alternatives to the Proposed Project (Continued)

Issue Area/Impact	Proposed Project ¹	Magnitude of Impact in Comparison to the Proposed Project ²						
		Alternative 1: No Project Alternative ³	Alternative 2: Reduced Development Envelope Option A	Alternative 3: Reduced Development Envelope Option B	Alternative 4: Reduced Development Envelope Option C	Alternative 5: Reduced Development Envelope Option D	Alternative 6: Offsite Alternative ⁴	Alternative 7: Reduced Open Space Alternative ⁵
H/WQ-4: Impact of Comstock Homes Development sewer discharge to GWSD Devereux trunkline	Class III	Class III (–)	Class III (–)	Class III (–)	Class III (=)	Class III (=)	Class III (–)	Class III (=)
H/WQ-5: Impact of improvements to Phelps Ditch Trail on water quality in creek	Class II	Not applicable	Class II (=)	Class II (=)	Class II (=)	Class II (=)	Not applicable	Not applicable
H/WQ-6: Impact of Open Space parking area on flood potential	Class II	Not applicable	Class II (=)	Class II (=)	Class II (=)	Class II (=)	Not applicable	Class II (=)
H/WQ-7: Impact of Open Space parking area on water quality in Devereux Creek	Class II	Not applicable	Class II (=)	Class II (=)	Class II (=)	Class II (=)	Not applicable	Class II (=)
H/WQ-8: Impact of Open Space Plan area improvements on water quality in Devereux Creek	Class II	Not applicable	Class II (=)	Class II (=)	Class II (=)	Class II (=)	Not applicable	Class II (=)
H/WQ-9: Impact of possible Devereux Creek Bridge and Boardwalk on flooding potential in creek	Class II	Not applicable	Class II (=)	Class II (=)	Class II (=)	Class II (=)	Not applicable	Not applicable
H/WQ-10: Impact of possible Devereux Creek Boardwalk and Steps scenario on long-term hydrology and water quality	Class IV (B) / Class II	Not applicable (X)	Class IV (B) (=) / Class II	Class IV (B) (=) / Class II	Class IV (B) (=) / Class II	Class IV (B) (=) / Class II	Not applicable (X)	Not applicable (X)
H/WQ-11: Cumulative impact on water quality in Devereux Creek due to increased use of Open Space Plan area	Class II	Class II (–)	Class II (–)	Class II (–)	Class II (=)	Class II (=)	Class III	Class II (=)
H/WQ-12: Cumulative impacts on water quality in Devereux Creek/Slough due to project bioswales design, installation, or maintenance	Class II	Not applicable	Class II (=)	Class II (=)	Class II (=)	Class II (=)	Not applicable	Class II (=)
H/WQ-13: Cumulative impacts on downstream flood hazard due to creation of impervious surfaces	Class II	Class II (–)	Class II (–)	Class II (–)	Class II (–)	Class II (–)	Class II (=)	Class II (=)
Biological Resources								
BIO-1: Southern Tarplant	Class II	Class II (+)	Class II (=)	Class II (=)	Class II (=)	Class II (=)	Class III	Class II (=)
BIO-2: Western Snowy Plover	Class II	Class III	Class II (–)	Class II (–)	Class II (–)	Class II (–)	Class III	Class II (=)
BIO-3: Monarch Butterflies	Class I	Class I (+)	Class III	Class III	Class III	Class III	Class III	Class I (=)
BIO-4: Roosting and Foraging Habitat for Raptors, Loggerhead Shrikes, and Bats	Class I	Class I (=)	Class I (–)	Class I (–)	Class I (–)	Class I (–)	Class III	Class I (=)
BIO-5: Nesting Habitat for Raptors and Loggerhead Shrikes	Class I	Class II	Class I (=)	Class I (=)	Class I (=)	Class I (=)	Class III	Class I (=)

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BIO-6: Other Special-Status Wildlife Species	Class II	Class II (+)	Class II (–)	Class II (–)	Class II (=)	Class II (=)	Class II (red-legged frog)	Class II (=)
BIO-7: Non-regulated Wildlife Species	Class III	Class III (–)	Class III (–)	Class III (–)	Class III (–)	Class III (–)	Class III (–)	Class III (=)
BIO-8: Wildlife Corridor	Class III	Class I (+)	Class III (=)	Class III (–)	Class III (=)	Class III (=)	Class III (=)	Class III (=)
BIO-9: Native Grassland	Class I	Class I (=)	Class I (=)	Class I (=)	Class I (=)	Class III	Class III	Class I (=)
BIO-10: Wetlands	Class II	Class II (+)	Class II (–)	Class II (–)	Class II (–)	Class II (–)	Class II (=)	Class II (=)
BIO-11: Exotic Plants	Class II	Class II (+)	Class II (=)	Class II (=)	Class II (=)	Class II (=)	Class III	Class II (=)
BIO-12: Water Pollution	Class II	Class II (=)	Class II (–)	Class II (–)	Class II (=)	Class II (=)	Class II (=)	Class II (=)
BIO-13: General Impacts Associated With Proposed Trail System	Class III	Not applicable	Class III (=)	Class III (=)	Class III (=)	Class III (=)	Not applicable	Not applicable
BIO-14: Impacts Associated With Closed Trail System	Class IV (B)	Not applicable (X)	Class IV (B) (=)	Class IV (B) (=)	Class IV (B) (=)	Class IV (B) (=)	Not applicable (X)	Not applicable (X)
BIO-15: Rezoning from Residential to Recreation	Class IV (B)	Not applicable (X)	Class IV (B) (=)	Class IV (B) (=)	Class IV (B) (=)	Class IV (B) (=)	Not applicable (X)	Class IV (B) (=)
BIO-16: General Impacts Associated With Proposed Phelps Ditch Trail	Class III	Not applicable	Class III (=)	Class III (=)	Class III (=)	Class III (=)	Not applicable	Not applicable
BIO-17: Managing Public Access	Class IV (B)	Not applicable (X)	Class IV (B) (=)	Class IV (B) (=)	Class IV (B) (=)	Class IV (B) (=)	Not applicable (X)	Not applicable (X)
BIO-18: General Impacts Associated With Proposed Trail System	Class III	Not applicable	Class III (=)	Class III (=)	Class III (=)	Class III (=)	Not applicable	Not applicable
BIO-19: Impacts Associated With Proposed Anza Trail Widening	Class II	Not applicable	Class II (=)	Class II (=)	Class II (=)	Class II (=)	Not applicable	Not applicable
BIO-20: Impacts Associated With Closed Trail System	Class IV (B)	Not applicable	Class IV (B) (=)	Class IV (B) (=)	Class IV (B) (=)	Class IV (B) (=)	Not applicable (X)	Not applicable (X)
BIO-21: Short-Term Impacts Associated With Proposed Parking Lot and Restroom	Class II	Not applicable	Class II (=)	Class II (=)	Class II (=)	Class II (=)	Not applicable	Class II (–)
BIO 22: Long-Term Impacts Associated With Proposed Parking Lot and Restroom	Class II	Not applicable	Class II (=)	Class II (=)	Class II (=)	Class II (=)	Not applicable	Class II (–)
BIO-23: Rezoning from Planned Residential to Recreation	Class IV (B)	Not applicable (X)	Class IV (B) (=)	Class IV (B) (=)	Class IV (B) (=)	Class IV (B) (=)	Not applicable	Class IV (B) (=)
BIO-24: Cumulative Impact to Wildlife Resources	Class II	Class II (+)	Class II (–)	Class II (–)	Class II (–)	Class II (–)	Class II (–)	Class II (=)

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Hazards and Hazardous Materials								
HM-1: Impacts from abandoned oil wells	Class II	Class II (+)	Class II (=)	Class II (=)	Class II (=)	Class II (=)	Not applicable	Class II (=)
HM-2: Impacts from known or potential contaminated soil	Class II	Class II (+)	Class II (=)	Class II (=)	Class II (=)	Class II (=)	Class II (+)	Class II (=)
HM-3: Impacts from physical hazards related to oil development equipment and debris	Class II	Class II (+)	Class II (=)	Class II (=)	Class II (=)	Class II (=)	Not applicable	Class II (=)
HM-4: Impacts to water quality from contaminated soil leaching to groundwater or migrating to Devereux Creek or Devereux Slough	Class III	Class III (=)	Class III (=)	Class III (=)	Class III (=)	Class III (=)	Class III (=)	Class III (=)
HM-5: Cumulative Impacts	Class III (=)	Class III (=)	Class III (=)	Class III (=)	Class III (=)	Class III (=)	Class III (=)	Class III (=)
Land Use								
Land-1: Impact to regional land use planning relative to need for additional housing and the need for coastal resource protection	Class IV (B)	Class I (X)	Class IV (B)	Class IV (B)	Class IV (B)	Class IV (B)	Class I (X)	Class IV (B) (+)
Land-2: Cumulative impacts on increased use of Open Space Plan area	Class II	Class II (–)	Class II (–)	Class II (–)	Class II (=)	Class II (=)	Class II (–)	Class II (=)
Agriculture	No impact	No impact	No impact	No impact	No impact	No impact	No impact	No impact
Mineral Resources	No impact	No impact	No impact	No impact	No impact	No impact	No impact	No impact
Visual Resources								
VIS-1: Long-term views of the residential development from Key Observation Points	Class I	Class I (–)	Class I (–)	Class I (–)	Class I (–)	Class I (–)	Class I (=)	Class I (=)
VIS-2: Views from Winchester Commons	Class III	Class III (–)	Class III (=)	Class III (–)	Class III (=)	Class III (=)	Class III (=)	Class III (=)
VIS-3: Neighborhood compatibility	Class II	Class II (=)	Class II (=)	Class II (=)	Class II (=)	Class II (=)	Class II (=)	Class II (=)
VIS-4: Visual impacts related to the Santa Barbara Shores Public Access area	Class III	Not applicable	Class III (=)	Class III (=)	Class III (=)	Class III (=)	Not applicable	Class III (–)
VIS-5: Light and glare from residential development and Open Space improvements	Class II	Class II (+)	Class II (=)	Class II (–)	Class II (=)	Class II (=)	Class II (=)	Class II (=)
VIS-6: Short-term construction impacts	Class III	Class III (–)	Class III (=)	Class III (–)	Class III (=)	Class III (=)	Class III (=)	Class III (=)
VIS-7: Cumulative loss of scenic coastal vistas and open space	Class I	Class I (+)	Class I (=)	Class I (–)	Class I (=)	Class I (=)	Class I (=)	Class I (=)

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Recreation								
REC-1: Impacts to existing regional recreational facilities	Class III	Class III (–)	Class III (–)	Class III (–)	Class III (–)	Class III (–)	Class II	Class III (=)
REC-2: Demand for new regional recreation facilities	Class III	Class III (=)	Class III (=)	Class III (=)	Class III (=)	Class III (=)	Class III (–)	Class III (=)
REC-3: Residential rezone and development	Class I	Not applicable	Class I (=)	Class I (–)	Class I (=)	Class I (=)	Not applicable	Class I (=)
REC-4: Open space rezone and access improvements	Class IV (B)	Not applicable (X)	Class IV (B) (=)	Class IV (B) (=)	Class IV (B) (=)	Class IV (B) (=)	Not applicable (X)	Class IV (B) (–)
REC-5: Open Space Plan trail closures	Class I	Not applicable; however, existing trails on Ellwood Mesa could be affected	Class I (=)	Class I (=)	Class I (=)	Class I (=)	Not applicable	Class II
REC-6: Open Space Plan trail user restrictions	Class I	Not applicable; however, existing users of trails on Ellwood Mesa could be affected	Class I (=)	Class I (=)	Class I (=)	Class I (=)	Not applicable	Class III
REC-7: Trail construction, well abandonment, and soil remediation	Class II	Class II (=) (no trail component)	Class II (=)	Class II (=)	Class II (=)	Class II (=)	Not applicable	Not applicable
REC-8: Cumulative increase in open space usage	Class I	Class I (–)	Class I (–)	Class I (–)	Class I (=)	Class I (=)	Class I (–)	Class I (=)
Cultural Resources								
Cultural-1: Impacts of ground disturbing activities on previously undiscovered CRHR eligible cultural resources	Class II	Class II (=)	Class II (=)	Class II (=)	Class II (=)	Class II (=)	Class II (–)	Class II (=)
Cultural-2: Cumulative impact of increased public use and access on previously undiscovered CRHR eligible sites	Class II	Class II (=)	Class II (=)	Class II (=)	Class II (=)	Class II (=)	Class II (–)	Class II (=)
Traffic and Circulation								
Traffic-1: Impact of Comstock Homes Development traffic (746 ADT) on study area roadways	Class III	Class III (–)	Class III (–)	Class III (–)	Class III (=)	Class III (=)	Class III	Class III (=)
Traffic-2: Impact of Comstock Homes Development traffic (79 p.m., PHT) on study area intersections	Class I	Class III	Class I (–)	Class I (–)	Class I (=)	Class I (=)	Class I (–)	Class I (=)
Traffic-3: Impact of proposed access to Ellwood Mesa Open Space Plan area park on Hollister Avenue/Ellwood School intersection	Class II	Not applicable	Class II (=)	Class II (=)	Class II (=)	Class II (=)	Not applicable	Class II (=)

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Traffic-4: Cumulative impact of Comstock Homes Development on study area roadways	Class III	Class III (–)	Class III (–)	Class III (–)	Class III (=)	Class III (=)	Class III (–)	Class III (=)
Traffic-5: Cumulative impact of Comstock Homes Development on study area intersections (with Phelps Road extension)	Class III	Class III (–)	Class III (–)	Class III (–)	Class III (=)	Class III (=)	Class III (–)	Class III (=)
Traffic-6: Cumulative impact of Comstock Homes Development on study area intersections (without Phelps Road extension)	Class I	Class III	Class I (–)	Class I (–)	Class I (=)	Class I (=)	Class I (–)	Class I (=)
Noise								
N-1: Impact of projected future Hollister Avenue traffic noise on northern portion of Comstock Homes Development	Class II	Class III	Class II (=)	Class II (–)	Class II (=)	Class II (=)	Class III	Class II (=)
N-2: Short-term Comstock Homes construction noise impacts on Ellwood School, Santa Barbara Shores residences, and/or Sandpiper Golf Course	Class I	Class II	Class I (–)	Class I (–)	Class I (–)	Class I (–)	Class II	Class I (=)
N-3: Short-term parking lot and restroom construction noise impacts on Ellwood School, Santa Barbara Shores residences, and Open Space users	Class I	Not applicable	Class I (=)	Class I (=)	Class I (=)	Class I (=)	Not applicable	Class I (–)
Air Quality								
AQ-1: Short-term impacts due to PM ₁₀ emissions during construction of Comstock Homes Development	Class II	Class II (–)	Class II (–)	Class II (–)	Class II (–)	Class II (–)	Class III	Class II (=)
AQ-2: Short-term impacts due to NO _x and ROG emissions during construction of Comstock Homes Development	Class III	Class III (–)	Class III (–)	Class III (–)	Class III (–)	Class III (–)	Class III	Class III (=)
AQ-3: Long-term air quality impacts from residential project source emissions, including wood-burning fireplaces and stoves, of ROG	Class I	Class III	Class I (–)	Class I (–)	Class I (=)	Class I (=)	Class I (–)	Class I (=)
AQ-4: Impact of exposing residences to existing sources of odor in the region	Class III	Class III (=)	Class III (=)	Class III (=)	Class III (=)	Class III (=)	Class II	Class III (=)
AQ-5: Impact of exposing residences to sources of HAP emissions in the region	Class III	Class III (=)	Class III (=)	Class III (=)	Class III (=)	Class III (=)	Class II	Class III (=)
AQ-6: Short-term impacts due to PM ₁₀ emissions during construction of Open Space Plan area improvements	Class II	Not applicable	Class II (=)	Class II (=)	Class II (=)	Class II (=)	Not applicable	Class III

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B Beneficial impact
X Beneficial impact would not be realized

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Table 6-I. Comparison of Alternatives to the Proposed Project (Continued)

Issue Area/Impact	Proposed Project ¹	Magnitude of Impact in Comparison to the Proposed Project ²						
		Alternative 1: No Project Alternative ³	Alternative 2: Reduced Development Envelope Option A	Alternative 3: Reduced Development Envelope Option B	Alternative 4: Reduced Development Envelope Option C	Alternative 5: Reduced Development Envelope Option D	Alternative 6: Offsite Alternative ⁴	Alternative 7: Reduced Open Space Alternative ⁵
AQ-7: Cumulative impacts due to PM ₁₀ emissions from construction	Class II	Class II (–)	Class II (–)	Class II (–)	Class II (–)	Class II (–)	Class II (–)	Class II (–)
AQ-8: Cumulative impacts due to NO _x and ROG emissions during construction	Class III	Class III (–)	Class III (–)	Class III (–)	Class III (–)	Class III (–)	Class III (–)	Class III (–)
AQ-9: Cumulative impacts due to ROG and NO _x emissions during project operations	Class I	Class III	Class I (–)	Class I (–)	Class I (=)	Class I (=)	Class I (–)	Class I (=)
AQ-10: Cumulative impacts due to CO Hotspot forming at intersection of Storke/ Hollister associated with vehicular traffic	Class III	Class III (–)	Class III (–)	Class III (–)	Class III (=)	Class III (=)	Class II	Class II
Public Services								
PS-1: Impact of Comstock Homes Development on electrical and natural gas supplies	Class III	Class III (–)	Class III (–)	Class III (–)	Class III (=)	Class III (=)	Class III (–)	Class III (=)
PS-2: Impact of Comstock Homes Development on sewer capacity and conveyance	Class III	Class III (–)	Class III (–)	Class III (–)	Class III (=)	Class III (=)	Class III (–)	Class III (=)
PS-3: Impact of Comstock Homes Development on local school district demand/capacity	Class II	Class II (–)	Class II (–)	Class II (–)	Class II (=)	Class II (=)	Class II (–)	Class II (=)
PS-4: Impact of Comstock Homes Development on police protection services	Class III	Class III (–)	Class III (–)	Class III (–)	Class III (=)	Class III (=)	Class III (–)	Class III (=)
PS-5: Impact of Comstock Homes Development on fire protection services	Class II	Class II (–)	Class II (–)	Class II (–)	Class II (=)	Class II (=)	Class II (–)	Class II (=)
PS-6: Impact of solid waste generation during construction	Class III	Class III (–)	Class III (–)	Class III (–)	Class III (=)	Class III (=)	Class III (–)	Class III (=)
PS-7: Impact of solid waste generation during operations phase	Class III	Class III (–)	Class III (–)	Class III (–)	Class III (=)	Class III (=)	Class III (–)	Class III (=)
PS-8: Impact of Comstock Homes Development water demand on available GWD supplies	Class III	Class III (–)	Class III (–)	Class III (–)	Class III (=)	Class III (=)	Class III (–)	Class III (=)
PS-9: Cumulative impact of project on public services	Class II	Class II (–)	Class II (–)	Class II (–)	Class II (=)	Class II (=)	Class II (–)	Class II (=)
PS-10: Cumulative impact of Comstock Homes Development on the volume of solid waste stream and capacity of Tajiguas Landfill	Class II	Class II (–)	Class II (–)	Class II (–)	Class II (=)	Class II (=)	Class II (–)	Class II (=)

¹ Highest Impact Class identified in impact analyses presented in Section 4.0, where I – significant, unmitigable to less than significant; II = significant, but feasibly mitigated to less than significant; III = adverse, but insignificant; and IV = beneficial impact.

² Key:
+ More adverse impacts than proposed project
= Similar to proposed project
– Fewer adverse impacts than proposed project
B Beneficial impact
X Beneficial impact would not be realized

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*Section 6.0
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Figure 6.2-1

Figure 6.2-2

Figure 6.2-3

Figure 6.2-4

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It is anticipated that under this alternative, access would involve a southerly extension of Santa Barbara Shores Drive, including a span bridge across Devereux Creek (and adjacent monarch butterfly and raptor roosting habitat and environmentally sensitive habitat overlay), to the location(s) of the new dwellings that would be constructed on Ellwood Mesa.

In addition, this alternative would require the utility interconnections identified above; it is assumed that the interconnection points would be at the southern end of Santa Barbara Shores Drive. It is expected that the municipal sewer interconnection would be into the Goleta West Sanitary District's existing Devereux Trunk Line on Ellwood Mesa. For the purposes of this analysis, it is assumed that all utility interconnection lines would be buried and routed to avoid sensitive environmental habitat, where practical. It is assumed that under this alternative, the new dwelling units to be constructed would be concentrated in the west-central portion of Ellwood Mesa away from the bluffs and sensitive environmental habitat.

6.2.1.2 Comparative Impacts

Following is a general description of the potential impacts of the No Project Alternative, compared to each of the impacts presented in Section 4.0, which analyzes the proposed project.

6.2.1.2.1 Geology and Geologic Hazards. Since no development would occur on the site of the proposed Comstock Homes Development, none of the geology and geologic hazards impacts anticipated upon development of the proposed subdivision would occur. All of those impacts were judged to be mitigable (Class II), or less than significant (Class III). Depending on the siting of the five home sites proposed under this Alternative, similar or lesser intensity of impacts related to Geology and Geologic Hazards would be expected.

Geologic conditions and hazards that are present on the pertinent portion of Ellwood Mesa for Alternative 1 include:

- Relatively steep slopes in the vicinity of Devereux Creek where a span bridge would need to be constructed for access to the five dwelling units on Ellwood Mesa envisioned under this Alternative (refer to Figure 4.2-1, Local Topography); utility crossings of Devereux Creek would also be required
- Faulting and seismicity hazards (North Branch More Ranch Fault and Middle Branch More Ranch Fault) (refer to Figure 4.2-2)
- Soils with slight (CgA) to very high (gullying) (CgC2) erosion hazard (refer to Figure 4.2-4 and Table 4.2-1)

With implementation of the mitigation measures for geology and geologic hazards presented in Section 4.2.3.4, it is expected that impacts for Alternative 1 could be mitigated to less than significant levels.

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6.2.1.2.2 Hydrology and Water Quality. Since no development would occur on the site of the proposed Comstock Homes Development, none of the hydrology and water quality impacts anticipated upon development of the proposed subdivision would occur. All of those impacts were judged to be mitigable (Class II), or less than significant (Class III). Depending on the siting of the five home sites considered under this Alternative, similar, or lesser intensity of impacts related to Hydrology and Water Quality would be expected.

Construction of five dwellings and associated access road and utilities on Ellwood Mesa associated with this Alternative has the potential to cause impacts to surface hydrology, erosion and sedimentation, and water quality in Devereux Creek and Slough. Construction of a span bridge across Devereux Creek to provide access to the Ellwood Mesa dwellings plus utility crossings of Devereux Creek have the potential to cause short-term construction water quality impacts as well as long-term hydrologic and flooding potential effects. In addition, construction of five dwellings on Ellwood Mesa has the potential to result in short-term and long-term effects on hydrology and water quality. It is assumed that the five dwellings would discharge sewage to the GWSD Devereux trunkline that traverses Ellwood Mesa and would not be on septic systems. As long as the five dwellings were sited well south of Devereux Creek, no conflicts with 100-year floodplains would occur. It is expected that the construction of five dwellings, including associated access road and utilities, would disturb far less acreage than the proposed project and create less impervious surfaces and less runoff than the proposed Comstock Homes Development. The proposed Comstock Homes Development includes drainage and water quality control features (detention basins and bioswales) to protect water quality in Devereux Creek/Slough; it is not known if the five dwellings on Ellwood Mesa (Alternative 1) would have similar features since the home spacing has not been determined for this alternative. The potential adverse and beneficial impacts to water quality and hydrology associated with implementation of the Ellwood Mesa Open Space Plan would not occur under this alternative. With implementation of the mitigation measures for water quality and hydrology presented in Section 4.3.3.4, it is expected that impacts related to water quality and hydrology for Alternative 1 could be mitigated to less than significant levels.

6.2.1.2.3 Biological Resources. It is assumed that five residential building sites could be sited and constructed on Ellwood Mesa to avoid direct impacts on most sensitive biological resources. Alternative 1 would introduce far fewer new residents into the area and reduce potential effects associated with increased use of adjacent open space areas. However, the access road to the dwelling(s) location(s) is envisioned to be an extension of the southern end of Santa Barbara Shores Drive that would require a span bridge crossing of Devereux Creek. This crossing, including roadway and various utility interconnections, would directly impact at least several hundred feet of Environmentally Sensitive Habitat Overlay for eucalyptus woodland/monarch butterfly and raptor roosting habitat (refer to Figure 4.4-3), and likely isolated patches of native grassland. Southern vernal pools are also located nearby (to the east) on Ellwood Mesa. In addition, the introduction of a paved access road (with associated vehicular traffic) and five dwelling units on Ellwood Mesa would disrupt sensitive habitat and species and likely present a major obstruction to wildlife movement and migration in this biologically

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sensitive area. The five dwellings that would be constructed on Ellwood Mesa under this Alternative would be much closer to the Coronado Butterfly Preserve, the extensive Environmentally Sensitive Habitat Overlay area on the eastern portion of Ellwood Mesa, and the University's Coal Oil Point Reserve than the proposed Comstock Homes Development. Accordingly, potential impacts associated with disturbance, night lighting and traffic, introduction of exotic species, and predation by pets are a concern for Alternative 1. As discussed in Section 6.2.1.1, selection of Alternative 1 would negate the land exchange and the benefits of the Ellwood Mesa Open Space Plan with respect to biological resources. Overall, selection of Alternative 1 would have greater impacts on biological resources than the proposed project (or Alternatives 2 through 5, and 7).

6.2.1.2.4 Hazards and Hazardous Materials. It is assumed that any residual contamination on Ellwood Mesa would be remediated prior to construction of the five residential units, including associated access roads and utility interconnections, considered under Alternative 1. This impact is considered to be potentially significant, but mitigable (Class II) for both the proposed project and Alternative 1. Alternative 1 may require remediation for residential use on Ellwood Mesa. Additional investigation and remediation activities would likely be required on Ellwood Mesa prior to construction of any residences.

6.2.1.2.5 Land Use. By allowing no residential development on the site of the proposed Comstock Homes Development, no rezone would be necessary. Placing five residential units on Ellwood Mesa would also be consistent with the existing zoning. Whereas the proposed project would require a rezone on the Comstock Homes Development site from Recreation to Residential, Alternative 1 would not. No significant land use related impacts are anticipated for the proposed project or Alternative 1, although Alternative 1 would potentially permanently affect the character and uses of a portion of Ellwood Mesa via the conversion of a portion of Ellwood Mesa from open space to residential.

6.2.1.2.6 Agriculture. This impact was judged to be less than significant for the proposed project, due to the lack of active agricultural operations on the project site, and the fact that none of the site is zoned for agriculture. Neither the proposed project nor Alternative 1 would be expected to have any impact on agriculture.

6.2.1.2.7 Mineral Resources. This impact was judged to be less than significant for the proposed project, due to the lack of known economically recoverable mineral resources within the project site. Neither the proposed project nor Alternative 1 would be expected to have an impact on mineral resources.

6.2.1.2.8 Visual Resources. Since no development would occur on the site of the proposed Comstock Homes Development, none of the visual impacts anticipated upon development of the proposed subdivision would occur, including Class I impacts. The five dwellings that are envisioned under Alternative 1 on Ellwood Mesa are also expected to result in an unavoidable adverse significant visual effect (Class I). Whereas the visual impacts of the proposed project would be limited primarily to users of the newly formed Ellwood Mesa Open

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Section 6.0 Space Plan area and Sandpiper Golf Course, the five dwellings and associated infrastructure on Ellwood Mesa would primarily impact users of the adjacent Santa Barbara Shores open space area. The five dwellings envisioned under Alternative 1 would not impact ocean/island views from Hollister Avenue. The magnitude of the proposed Comstock Homes Development is much greater than the five homes envisioned on Ellwood Mesa under Alternative 1.

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6.2.1.2.9 Recreation. Reducing the overall residential yield of this project, as proposed under Alternative 1, would place a correspondingly lesser demand on recreation services, due to fewer anticipated future residents in the project area. From a demand standpoint, the proposed project's impact on recreation is considered adverse but not significant (Class III). This impact would be even less adverse for Alternative 1.

From a supply standpoint, the proposed project's impact on recreation is considered beneficial (Class IV) because it would: a) rezone 136.62 acres of residentially-zoned land to recreation, thus preserving 136.62 acres of contiguous open space; b) restore and preserve existing sensitive habitats; c) maintain and manage recreational facilities; and d) provide for coordination of these activities with the adjacent University and County of Santa Barbara jurisdictional lands, resulting in a total of 652 contiguous acres of coastal habitat restoration and coastal recreational access. Under the Alternative 1 scenario, the existing Santa Barbara Shores parcel would remain as a public open space, however, open space restoration, maintenance and management would not occur on Ellwood Mesa as under the proposed project. Additionally, linkages to the University and County jurisdictional lands would likely be reduced unless trail easements on Ellwood Mesa were dedicated to maintain linkages. Thus the key benefits of the Open Space Plan would not be realized. Thus, from a CEQA perspective, Alternative 1 would not necessarily result in new adverse impacts (relative to the proposed project), but it would eliminate many of the beneficial recreation impacts associated with the proposed project.

The proposed project envisions trail closures on Ellwood Mesa that would be considered Class I impacts. It is expected that Alternative 1 may also result in trail closures and/or realignments to avoid conflicts with the envisioned five new dwellings and north/south paved access road.

6.2.1.2.10 Cultural Resources. Although no known cultural resources exist at the project site, grading activities associated with site development of the residential area, however limited, and/or recreational facilities, may impact previously undiscovered cultural resources. However, incorporation of the mitigation measure identified for the proposed project would similarly be appropriate for Alternative 1. The impact of Alternative 1 on Cultural Resources is the same as for the proposed project.

6.2.1.2.11 Traffic and Circulation. Reducing the overall residential yield of this project, as proposed by Alternative 1, would generate correspondingly fewer auto trips, and less vehicle miles traveled, due to fewer anticipated future residents in the project area. The impact on Traffic and Circulation is judged significant and unmitigable (Class I) for the proposed project, and less than significant (Class III) for Alternative 1.

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6.2.1.2.12 Noise. The primary noise sources for the proposed project are operational phase traffic on Hollister Avenue (i.e., that would affect residents at new Comstock Homes Development), as well as short-term, significant (Class I) construction noise impacts. Removing residential, construction uses, and intensity of development from proximity to Hollister Avenue would reduce noise impacts, including construction noise impacts on Ellwood School. The scale of the proposed project (78 units) versus Alternative 1 (5 units) indicates that construction noise intensity and duration would be much greater for the proposed project. Both the proposed project and Alternative 1 would cause noise impacts to the existing Santa Barbara Shores residential area during construction. The five dwellings envisioned under Alternative 1 would also require construction of a new access road off the southern end of Santa Barbara Shores Drive, including a span bridge over Devereux Creek. The proximity of existing residences to this road/bridge construction work is closer than the proposed project's proximity to residences. Alternative 1 would also introduce long-term traffic noise in an area that currently is undeveloped. The five residences under Alternative 1 would not be subject to noise impacts from Hollister Avenue. Under Alternative 1, noise impacts on the residences from Hollister Avenue would not occur. The proposed project is judged to result in significant, unmitigable (Class I) construction noise impacts while Alternative I is expected to result in Class II impacts. Operational noise impacts, while judged mitigable (Class II) for the proposed project, are even less (Class III) for Alternative 1.

6.2.1.2.13 Air Quality. Reducing the overall residential yield of the project, as envisioned under Alternative 1, would place a correspondingly lesser demand on air quality resources, due to fewer anticipated future residents in the project area, and correspondingly less auto trips and vehicle miles traveled. The impact on Air Quality, while judged significant (Class I) for the proposed project, is less than significant (Class III) for Alternative 1.

6.2.1.2.14 Public Services. Reducing the overall residential yield of this project, as envisioned under Alternative 1, would place a correspondingly lesser demand on public services, due to fewer anticipated future residents in the project area. However, the five residences assumed under Alternative 1 would require longer utility interconnections with associated costs and environmental effects. The impact on Public Services, is judged mitigable for both the proposed project, and Alternative 1.

6.2.2 Alternative 2: Reduced Development Envelope Option A

6.2.2.1 Description of Alternative 2

This Alternative proposes fewer than 78 single-family residences to be sited on the 36-acre Santa Barbara Shores property, in the same general area and configuration as the proposed project. However, under this alternative, the development area would avoid the environmentally sensitive habitat (and associated buffer) for the monarch butterfly and raptor roosting along the southern portion of the western boundary of the Santa Barbara Shores property. Additionally, this alternative would avoid the placement of drainage control/water quality basins within the riparian buffer on the east-central portion of the development and within the environmentally

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sensitive habitat overlay setback along the southern boundary of the development area. Under this alternative, approximately 9 lots in the southwest portion of the proposed development area would not be developed due to their proximity to eucalyptus wetlands and buffers. The area of the proposed development cul-de-sac serving these 9 lots would also not be available for development. In addition, it is assumed that 2 to 4 additional lots would not be developed due to the need to relocate drainage control/water quality basins away from environmentally sensitive habitat overlay setbacks and riparian buffers. The total area available for residential development under Alternative 2 is approximately 21.04 acres. Unless the proposed lot size and layout are revised, about 15 percent fewer lots would be developed under this alternative, compared to the proposed project. The developed area would be allowed to impact all or portions of 6 separate isolated native grassland acres totaling approximately 0.41 acre (including 10-foot buffers) in the south-central portion of the development area. A bridge across the drainage to the eastern cul-de-sac on the northeast portion of the site would be allowed to impact the riparian buffer, under this Alternative.

Potential impacts (adverse and beneficial) associated with Open Space Plan improvements are the same for this Alternative as for the proposed project.

6.2.2.2 Comparative Impacts

Following is a general description of the potential impacts of this Alternative, compared to each of the impacts presented in Section 4.0, which analyzes the proposed project.

6.2.2.2.1 Geology and Geologic Hazards. Since development is still proposed on the site of the proposed Comstock Homes Development under this Alternative, the same impacts anticipated upon development of the proposed subdivision would occur, as compared to the proposed project. Alternative 2 would result in less alteration of topography and less soil disturbance than the proposed project. All of those impacts were judged to be mitigable (Class II), or less than significant (Class III).

6.2.2.2.2 Hydrology and Water Quality. Since development is still proposed on the site of the proposed Comstock Homes Development, the same impacts anticipated upon development of the proposed subdivision would occur, as compared to the proposed project. Alternative 2 would require less acreage and soil disturbance than the proposed project. Alternative 2 would also create less impervious surfaces. All of those impacts were judged to be mitigable (Class II), or less than significant (Class III).

6.2.2.2.3 Biological Resources. As discussed in Section 6.2.2.1, under this Alternative, the project would be designed to avoid identified biological resources including environmentally sensitive habitat (and associated buffer) for the monarch butterfly and raptor roosting as well as riparian buffer areas. Under Alternative 2, the eucalyptus woodland/monarch butterfly environmentally sensitive habitat overlay area along the southern half of the western boundary and along the southern boundary of the Comstock Homes Development site would be avoided.

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Additionally, under Alternative 2 the drainage control/water quality basins within the riparian buffer on the east-central portion of the site and within the environmentally sensitive habitat overlay setback area along the southern boundary of the site would be relocated out of these sensitive areas.

Alternative 2 would still directly impact a small wetland area where a bridge to be constructed on a cul-de-sac south of Hollister Avenue (see Figure 6.2-1) crosses a drainage. This impact would be avoided by Alternative 3 (see Section 6.2.3). Alternative 2 would also impact approximately 6 areas of isolated native grassland totaling about 0.41 acre, including 10-foot buffer. This impact would be avoided by Alternative 5 (see Section 6.2.5).

Alternative 2 (Class III) would have substantially less adverse impacts than the proposed project (Class I) with respect to eucalyptus woodland/monarch butterfly and raptor roosting habitat. In summary, Alternative 2 is considered to be preferable to the proposed project from a biological standpoint.

6.2.2.2.4 Hazards and Hazardous Materials. It is assumed that any residual contamination on the Comstock Homes Development site would be remediated prior to construction of residential units, thus impacts under the proposed project and Alternative 2 are similar and potentially significant, but mitigable (Class II).

6.2.2.2.5 Land Use. The proposed project is expected to improve the regional land use setting by balancing the need for additional housing with the need for coastal resource protection (Class IV, beneficial impact). Alternative 2 would be expected to result in the same beneficial impact.

The proposed project is also expected to contribute to potentially significant (Class II) cumulative impacts associated with increased public use, access, or activities in the Open Space Plan area. Alternative 2 would also be expected to contribute to this potentially significant cumulative impact (Class II) associated with increased use of the Open Space Plan area, but at a lower level than the proposed project due to the decreased number of residential units envisioned under Alternative 2. With implementation of the land use mitigation measures specified in Section 4.6.3.4, impacts associated with the proposed project or Alternative 2 would be reduced to a less than significant level.

6.2.2.2.6 Agriculture. This impact was judged to be less than significant for the proposed project, due to the lack of active agricultural operations on the project site, and the fact that none of the site is zoned for agriculture. Neither the proposed project nor alternative 2 would be expected to have any impact on agriculture.

6.2.2.2.7 Mineral Resources. This impact was judged to be less than significant for the proposed project, due to the lack of known economically recoverable mineral resources within the project site. This conclusion remains unchanged for Alternative 2.

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6.2.2.2.8 Visual Resources. Visual impacts for the proposed project were judged to be significant and not feasibly mitigated (Class I). This Alternative, which although less intense than the proposed project, is also expected to result in significant Class I visual impacts. The primary difference between the proposed project and Alternative 2 from a visual perspective is that Alternative 2 would not develop residential lots along the southern half of the western site boundary adjacent to the eastern edge of Sandpiper Golf Course. In addition, the proposed project includes plans to remove over 100 eucalyptus trees in the aforementioned portion of the development area; eucalyptus trees along the southwest site boundary would not be removed under Alternative 2. Alternative 2 would be expected to reduce visual impacts from Key Observation Points (KOPs) G-5 and G-4 (refer to Figure 4.9-1). Alternative 2 would reduce visual impacts primarily to users of Sandpiper Golf Course since the residential development on the southwest portion of the Comstock Homes Development would be recessed by approximately one lot width and the intervening eucalyptus windrow would remain instead of being substantially thinned under the proposed project.

Although Alternative 2 would reduce visual impacts for users of Sandpiper Golf Course, other Class I visual impacts associated with the proposed project would occur for Alternative 2 as well relative to open space users leaving and returning to the public parking lot south of Hollister Avenue (e.g., from KOPs G-6, G-7, and G-3).

In summary, both the proposed project and Alternative 2 would result in Class I visual impacts although the intensity of visual impacts for some viewers (e.g., users of Sandpiper Golf Course) would be lessened under Alternative 2.

6.2.2.2.9 Recreation. The proposed project is judged to result in Class I impacts to recreation with respect to the following considerations: displacement of the northwestern portion of Santa Barbara Shores Park, including existing trails and associated parking, with new residential development; implementation of restrictions and closure of selected trails in the Open Space Plan area; and contribution to the cumulative increase in usage of the Open Space area with commensurate deterioration of the inherent resources. Alternative 2 would be expected to result in all of the same Class I recreation impacts identified for the proposed project although the contribution to the cumulative increase in usage of the Open Space Plan area would be slightly less due to the reduced number of residential units for Alternative 2.

The proposed project is also judged to result in beneficial impacts (Class IV) to recreation associated with the Open Space Rezone and access improvements. The same beneficial impact would be attributable to Alternative 2.

6.2.2.2.10 Cultural Resources. Although no known cultural resources exist at the project site, grading activities associated with site development of the residential area, however limited, and/or recreational facilities, may impact previously undiscovered cultural resources. However, incorporation of the mitigation measures identified for the proposed project would similarly be appropriate for Alternative 2. The impact of Alternative 2 on Cultural Resources is the same as for the proposed project (Class II).

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6.2.2.2.11 Traffic and Circulation. Reducing the overall residential yield of this project, as proposed by Alternative 2, would generate correspondingly fewer auto trips, and less vehicle miles traveled, due to fewer anticipated future residents in the project area. The impact on Traffic and Circulation, while judged significant, unmitigable (Class I) for both the proposed project and Alternative 2, would be less for Alternative 2. Section 6.0
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6.2.2.2.12 Noise. The primary noise source for the proposed project is short term, significant and unavoidable (Class I), construction noise. Alternative 2 would also result in Class I construction noise impacts. Operational traffic on Hollister Avenue results in a potentially significant, but mitigable (Class II) impact. Since Alternative 2 would not substantially reduce the number of residential uses in proximity to Hollister Avenue, potential operational Noise impacts, which are judged mitigable (Class II) for the proposed project, would be the same for this Alternative. Construction-related impacts would be slightly less for this alternative, given the fewer units and smaller area of disturbance.

6.2.2.2.13 Air Quality. Reducing the overall residential yield of this project, as proposed by Alternative 2, would result in a correspondingly lesser impact on air quality, due to fewer anticipated future residents in the project area, and correspondingly fewer auto trips and vehicle miles traveled. The impact on Air Quality, while judged unmitigable (Class I) for the proposed project and Alternative 2 due to ROG emissions associated with the retention of woodburning fireplaces and stoves, would be less significant for Alternative 2.

6.2.2.2.14 Public Services. Reducing the overall residential yield of this project, as proposed by Alternative 2, would place a correspondingly lesser demand on public services, due to fewer anticipated future residents in the project area. The impact on several Public Services, which is judged potentially significant (Class II), but mitigable for the proposed project, would be less for Alternative 2.

6.2.3 Alternative 3: Reduced Development Envelope Option B

6.2.3.1 Description of Alternative 3

This Alternative would involve siting fewer than 78 single family residences on the 36 acre Santa Barbara Shores property, in the same general area and configuration as the proposed project. However, similar to the design of Alternative 2, development in accordance with Alternative 3 would avoid riparian areas and riparian buffers, as well as eucalyptus woodlands and associated environmentally sensitive habitat overlay buffers. Approximately 25 percent fewer lots (about 19 lots less) would be developed under this Alternative, compared to the proposed project. The seven residential lots proposed on the eastern cul-de-sac adjacent to Hollister Avenue, as well as the associated roadway and bridge that crosses a drainage/wetland area, would not be included under this Alternative. As per Alternative 2, the developed area would be allowed to impact all or portions of six separate isolated native grassland areas totaling 0.41 acre (with the 10-foot buffer) in the south-central portion of the development area. The total area available for residential development under this alternative is approximately 19.08 acres.

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Section 6.0 The potential impacts (adverse and beneficial) associated with Open Space Plan improvements
Alternatives are the same for this Alternative as for the proposed project and Alternatives 2, 4, and 5.

6.2.3.2 Comparative Impacts

Following is a general description of the potential impacts of this Alternative, compared to each of the impacts presented in Section 4.0, which analyzes the proposed project.

6.2.3.2.1 Geology and Geologic Hazards. Since development is still proposed on the site of the proposed Comstock Homes Development, the same impacts anticipated upon development of the proposed subdivision would occur, as compared to the proposed project. All of those impacts were judged to be mitigable (Class II), or less than significant (Class III). Alternative 3 would result in less alteration of topography and less soil disturbance than the proposed project and Alternatives 2, 4, 5, and 7.

6.2.3.2.2 Hydrology and Water Quality. Since development is still proposed on the site of the proposed Comstock Homes Development, the same impacts anticipated upon development of the proposed subdivision would occur, as compared to the proposed project. All of those impacts were judged to be mitigable (Class II), or less than significant (Class III). Alternative 3 would not include the proposed seven-lot cul-de-sac development on the northeast portion of the Comstock Homes Development site, including the span bridge over Drainage A1 (refer to Figure 4.4-3 and Figure 6.2-2). Alternative 3, unlike the proposed project and Alternatives 2, 4, 5, and 7, would avoid direct impacts to Drainage A1 and the associated riparian area and buffer.

6.2.3.2.3 Biological Resources. Since the project, under this Alternative, would be designed to avoid identified biological resources such as drainages/wetlands, eucalyptus woodlands, and corresponding buffer areas, Alternative 3 would have less impacts on biological resources than the proposed project. Alternative 3 would impact isolated Native Grassland habitat (Class I) in the south-central portion of the Comstock Homes Development site; Alternative 5 would avoid direct impacts to these isolated Nature Grassland areas (and buffers).

6.2.3.2.4 Hazards and Hazardous Materials. It is assumed that any residual contamination on the Comstock Homes Development site would be remediated prior to construction of residential units, thus impacts under the proposed project and Alternative 3 are similar and potentially significant, but mitigable (Class II).

6.2.3.2.5 Land Use. Land use impacts for the proposed project were judged to be significant, but mitigable (Class II) and beneficial (Class IV). Therefore, the land use impacts associated with this Alternative, which is less intense than the proposed project, are also judged to be significant, but mitigable (Class II) and beneficial (Class IV).

Refer to the land use discussion for Alternative 2 (Section 6.2.2.2.5) for more information.

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6.2.3.2.6 Agriculture. This impact was judged to be less than significant for the proposed project, due to the lack of active agricultural operations on the project site, and the fact that none of the site is zoned for agriculture. This conclusion remains unchanged for Alternative 3. Neither the proposed project nor Alternative 3 would be expected to have any impact on agriculture.

6.2.3.2.7 Mineral Resources. This impact was judged to be less than significant for the proposed project, due to the lack of known economically recoverable mineral resources within the project site. This conclusion remains unchanged for Alternative 3.

6.2.3.2.8 Visual Resources. Visual impacts for the proposed project were judged to be significant and unmitigable (Class I).

The primary differences between the proposed project and Alternative 3 from a visual perspective are that Alternative 3 would not develop residential lots along southern half of the western site boundary adjacent to the eastern edge of Sandpiper Golf Course, and Alternative 3 would not include development of the seven-lot cul-de-sac on the northeast portion of the site south of Hollister Avenue. As discussed in Section 6.2.2.2.8 for Alternative 2, eucalyptus trees along the southwest site boundary would not be removed under Alternative 3. Alternative 3 would be expected to reduce visual impacts from Key Observation Points (KOPs) G-5, G-4, G-1, G-2, and G-3 (refer to Figure 4.9-1).

Alternative 3 would reduce impacts to Open Space Plan users as they entered and departed the area via the Hollister Avenue access point/parking area. Alternative 3 would also reduce visual impacts to viewers passing by the Comstock Home Development on Hollister Avenue.

Alternative 3 would also reduce visual impacts to users of Sandpiper Golf Course since the residential development on the southwest portion of the Comstock Homes Development would be recessed by approximately one lot width and the intervening eucalyptus windrow would remain instead of being substantially thinned under the proposed project.

Although Alternative 3 would reduce visual impacts for Open Space Plan users, users of Sandpiper Golf Course, and passersby on Hollister Avenue, Class I visual impacts associated with the proposed project would still occur for Alternative 3 relative to open space users leaving and returning to the public parking lot south of Hollister Avenue (e.g., from KOPs G-2, G-3, G-6, and G-7), and Sandpiper Golf Course users (e.g., KOP G-4).

In summary, both the proposed project and Alternative 3 would result in Class I visual impacts although the intensity of visual impacts for some viewers (e.g., users of Open Space and Sandpiper Golf Course and pedestrians traveling along Hollister Avenue) would be lessened under Alternative 3.

6.2.3.2.9 Recreation. Reducing the overall residential yield of this project, as proposed by Alternative 3, would place a correspondingly lesser demand on recreation services, due to fewer

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anticipated future residents in the project area. The proposed project is judged to result in Class I impacts to recreation as discussed in Section 4.10. The impacts of Alternative 3 on recreation are expected to be similar to Alternative 2 as discussed in Section 6.2.2.2.9.

6.2.3.2.10 Cultural Resources. Although no known cultural resources exist at the project site, grading activities associated with site development of the residential area, however limited, and/or recreational facilities, may impact previously undiscovered cultural resources. However, incorporation of the mitigation measures identified for the proposed project would similarly be appropriate for Alternative 3. The impact of Alternative 3 on Cultural Resources, considered to be mitigable (Class II), is the same as for the proposed project.

6.2.3.2.11 Traffic and Circulation. Reducing the overall residential yield of this project, as proposed by Alternative 3, would generate correspondingly fewer auto trips, and less vehicle miles traveled, due to fewer anticipated future residents in the project area. The impact on Traffic and Circulation, while judged significant, unmitigable (Class I) for the proposed project and Alternative 3, would be slightly less for Alternative 3.

6.2.3.2.12 Noise. The primary noise sources for the proposed project is short-term, significant (Class I) construction noise, and potentially significant, but mitigable (Class II) operational traffic on Hollister Avenue. Alternative 3 would reduce the extent of residential construction activities and associated noise. Alternative 3 would also reduce the number of residential uses in proximity to Hollister Avenue. Construction noise impacts, which are judged unmitigable (Class I) for the proposed project, would also be significant (Class I), but less for this Alternative.

6.2.3.2.13 Air Quality. Reducing the overall residential yield of this project, as proposed by Alternative 3, would result in a correspondingly lesser impact on air quality, due to fewer anticipated future residents in the project area, and correspondingly less auto trips and vehicle miles traveled. The impact on Air Quality, while judged unmitigable (Class I) for the proposed project and Alternative 3, would be less for Alternative 3.

6.2.3.2.14 Public Services. Reducing the overall residential yield of this project, as proposed by Alternative 3, would place a correspondingly lesser demand on public services, due to fewer anticipated future residents in the project area. The impact on Public Services, which is judged potentially significant (Class II), but mitigable for the proposed project (for certain services), would be less for Alternative 3.

6.2.4 Alternative 4: Reduced Development Envelope Option C

6.2.4.1 Description of Alternative 4

This Alternative is a variation of Alternative 2, in that attached single-family townhouse residential units are introduced into the project. Alternative 4 proposes 78 single-family detached and attached residences (mix undetermined) to be sited on the 36 acre Santa Barbara Shores

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property, in the same general area and configuration as the proposed project. However, in this Alternative, the developed area would avoid most riparian areas and riparian buffers, as well as eucalyptus woodlands and associated environmentally sensitive habitat overlay buffers. As per Alternatives 2 and 3, the developed area would be allowed to impact isolated native grassland areas. A bridge across the drainage (A1) to the eastern cul-de-sac would be allowed to impact the riparian area and buffer, under this Alternative. The total area available for residential development under this alternative is approximately 21.2 acres.

Potential impacts (adverse and beneficial) associated with Open Space Plan improvements are the same for this Alternative as for the proposed project.

6.2.4.2 Comparative Impacts

Following is a general description of the potential impacts of this Alternative, compared to each of the impacts presented in Section 4.0, which analyzes the proposed project.

6.2.4.2.1 Geology and Geologic Hazards. Since development is still proposed on the site of the proposed Comstock Homes Development, the same impacts anticipated upon development of the proposed subdivision would occur, as compared to the proposed project. All of those impacts were judged to be mitigable (Class II), or less than significant (Class III). Alternative 4 would result in less alteration of topography and less soil disturbance than the proposed project.

6.2.4.2.2 Hydrology and Water Quality. Since development is still proposed on the site of the proposed Comstock Homes Development, the same impacts anticipated upon development of the proposed subdivision would occur, as compared to the proposed project. All of those impacts were judged to be mitigable (Class II), or less than significant (Class III). Alternative 4 would require less acreage and soil disturbance than the proposed project. Additionally, Alternative 4 would create less impervious surfaces.

6.2.4.2.3 Biological Resources. Since the project, under this Alternative, would be designed to avoid identified biological resources such as wetlands, eucalyptus woodlands, and corresponding buffer areas (with the exception of the eastern cul-de-sac bridge), Alternative 4 would have less impacts on biological resources than the proposed project. The biological impacts of Alternative 4 are expected to be essentially the same as for Alternative 2 – refer to Section 6.2.2.2.3 for more information. Indirect effects on sensitive biological resources in the Open Space Plan area due to increased use and disturbance would be expected to be slightly greater for Alternative 4 (versus Alternative 2) due to the greater number of residential units allowed under Alternative 4.

6.2.4.2.4 Hazards and Hazardous Materials. It is assumed that any residual contamination on the Comstock Homes Development site would be remediated prior to construction of residential units, thus impacts under the proposed project and Alternative 4 are similar and potentially significant, but mitigable (Class II).

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6.2.4.2.5 Land Use. Despite the introduction of multifamily residential uses into the project, the overall density of this Alternative is not increased in comparison to the proposed project. The cumulative land use impacts of this Alternative on the Open Space Plan area continue to be considered potentially significant, but mitigable (Class II), which is the same conclusion reached on the proposed project. This Alternative would also be expected to result in the same beneficial (Class IV) impacts on land use as the proposed project.

6.2.4.2.6 Agriculture. This impact was judged to be less than significant for the proposed project, due to the lack of active agricultural operations on the project site, and the fact that none of the site is zoned for agriculture. This conclusion remains unchanged for Alternative 4. Neither the proposed project nor Alternative 4 would be expected to have any impact on agriculture.

6.2.4.2.7 Mineral Resources. This impact was judged to be less than significant for the proposed project, due to the lack of known economically recoverable mineral resources within the project site. This conclusion remains unchanged for Alternative 4.

6.2.4.2.8 Visual Resources. Despite the introduction of attached single-family townhouse residential uses into the project, the overall density of this Alternative is not increased. Visual impacts of this Alternative continue to be considered significant and unmitigable (Class I), which is the same conclusion reached on the proposed project. The visual impacts of Alternative 4 are expected to be similar to those presented for Alternative 2 in Section 6.2.2.2.8.

6.2.4.2.9 Recreation. Despite the introduction of attached single-family townhouse residential uses into the project, the overall density of this Alternative is not increased relative to the proposed project. Recreation impacts of this Alternative continue to be considered significant and unmitigable (Class I), which is the same conclusion reached for the proposed project.

The proposed project is judged to result in Class I impacts to recreation with respect to the following considerations: displacement of the northwestern portion of Santa Barbara Shores Park, including existing trails and associated parking, with new residential development; implementation of restrictions and closure of selected trails in the Open Space Plan area; and contribution to the cumulative increase in usage of the Open Space Plan area with commensurate deterioration of the inherent resources which may lead to further restrictions on users. Alternative 4 would be expected to result in all of the same Class I recreation impacts identified for the proposed project.

The proposed project is also judged to result in beneficial impacts (Class IV) to recreation associated with the Open Space Rezone and access improvements. The same beneficial impact would be attributable to Alternative 4.

6.2.4.2.10 Cultural Resources. Although no known cultural resources exist at the project site, grading activities associated with site development of the residential area, however limited,

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and/or recreational facilities, may impact previously undiscovered cultural resources. However, incorporation of the mitigation measures identified for the proposed project would similarly be appropriate for Alternative 4. The impact of Alternative 4 on Cultural Resources is the same as for the proposed project – i.e., potentially significant, but mitigable (Class II).

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6.2.4.2.11 Traffic and Circulation. Retaining the same overall residential yield of this Alternative, as compared to the proposed project, would generate virtually the same auto trips, and vehicle miles traveled, due to approximately the same number of anticipated future residents in the project area. The impact on Traffic and Circulation is judged to be significant and unmitigable (Class I) for the proposed project and Alternative 4.

6.2.4.2.12 Noise. The primary noise sources for the proposed project are short-term, significant (Class I), construction related effects, and potentially significant, but mitigable (Class II), traffic on Hollister Avenue during the operational phase. Since Alternative 4 would not reduce the number of residential units or uses in proximity to Hollister Avenue, the aforementioned Noise impact findings for the proposed project would be essentially the same for this Alternative.

6.2.4.2.13 Air Quality. Retaining the same overall residential yield of this project, as proposed by Alternative 4, would result in the same impacts on air quality, due to a similar number of anticipated future residents in the project area, and correspondingly similar auto trips and vehicle miles traveled. The impact on Air Quality, which is judged significant and unmitigable (Class I) for the proposed project, is equivalent for Alternative 4.

6.2.4.2.14 Public Services. Since Alternative 4 would not reduce or increase the number of residences in the project area relative to the proposed project, potential Public Service impacts, which are judged potentially significant, but mitigable (Class II) for the proposed project, would be the same for this Alternative.

6.2.5 Alternative 5: Reduced Development Envelope Option D

6.2.5.1 Description of Alternative 5

This Alternative is a variation of Alternatives 2 and 4, in that sensitive biological resources are avoided and attached single-family townhouse units are introduced into the project (refer to Figure 6.2-3). Alternative 5 proposes 78 detached single-family and attached townhouse residences (mix undetermined) to be sited on the 36 acre Santa Barbara Shores property, in the same general area and configuration as the proposed project. As per Alternative 4, under this Alternative, the developed area would avoid most riparian areas and riparian buffers, as well as eucalyptus woodlands and associated environmentally sensitive habitat overlay setbacks. However, unlike Alternatives 2, 3, and 4, the developed area would not be allowed to impact isolated native grasslands. Native grassland areas and associated setbacks (10 feet) would impact the configuration of about 10 lots as proposed, as well as one cul-de-sac. This alternative would remove approximately 0.41 acre from development due to the exclusion of native grassland

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Potential impacts (adverse and beneficial) associated with Open Space Plan improvements are the same for this Alternative as for the proposed project.

6.2.5.2 Comparative Impacts

Following is a general description of the potential impacts of this Alternative, compared to each of the impacts presented in Chapter 4, which analyzes the proposed project.

6.2.5.2.1 Geology and Geologic Hazards. Since the geographic area to be developed under this Alternative is less than the proposed project, impacts to Geology and Geologic Hazards would be correspondingly less when compared to the proposed project. Impacts in either case are judged to be potentially significant, but mitigable (Class II), or less than significant (Class III).

6.2.5.2.2 Hydrology and Water Quality. Since the geographic area to be developed under this Alternative is less than the proposed project, impacts to Hydrology and Water Quality would be correspondingly less significant when compared to the proposed project. Impacts in either case are judged to be potentially significant, but mitigable (Class II), or less than significant (Class III).

6.2.5.2.3 Biological Resources. Since the project, under this Alternative, would be designed to avoid identified biological resources such as wetlands, eucalyptus woodlands, and corresponding buffer areas (with the exception of the eastern cul-de-sac bridge), Alternative 5 would have less impacts on biological resources than the proposed project. The biological impacts of Alternative 5 would be expected to be similar to Alternative 2 as discussed in Section 6.2.2.2.3. However, Alternative 5 would also avoid impacts to all or portions of six isolated Native Grassland areas (with 10-foot buffers) in the south-central portion of the site, thereby avoiding this Class I impact associated with the proposed project and Alternatives 2, 3, 4, and 7. The six Native Grassland areas to be avoided total approximately 0.21 acre (0.41 acre with buffer).

6.2.5.2.4 Hazards and Hazardous Materials. It is assumed that any residual contamination on the Comstock Homes Development site would be remediated prior to construction of residential units, thus impacts under the proposed project and Alternative 5 are similar and potentially significant, but mitigable (Class II).

6.2.5.2.5 Land Use. Despite the introduction of attached townhouse units into the project, the overall density of this Alternative is not increased compared to the proposed project. Land use impacts under this Alternative continue to be considered insignificant (Class III), which is the same conclusion reached for the proposed project.

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6.2.5.2.6 Agriculture. This impact was judged to be less than significant for the proposed project, due to the lack of active agricultural operations on the project site, and the fact that none of the site is zoned for agriculture. This conclusion remains unchanged for Alternative 5.

6.2.5.2.7 Mineral Resources. This impact was judged to be less than significant for the proposed project, due to the lack of known economically recoverable mineral resources within the project site. This conclusion remains unchanged for Alternative 5.

6.2.5.2.8 Visual Resources. Despite the introduction of attached townhouse units into the project, the overall density of this Alternative is not increased. Visual impacts of this Alternative continue to be considered significant and unmitigable (Class I), which is the same conclusion reached for the proposed project. The visual impacts of this Alternative are expected to be similar to Alternative 2, as discussed in Section 6.2.2.2.8.

6.2.5.2.9 Recreation. Despite the introduction of attached townhouse units into the project, the overall density of this Alternative is not increased.

The proposed project is judged by the City of Goleta to result in Class I impacts to recreation with respect to the following considerations: displacement of the northwestern portion of Santa Barbara Shores Park, including existing trails and associated parking, with new residential development; implementation of restrictions and closure of selected trails in the Open Space Plan area; and contribution to the cumulative increase in usage of the Open Space area with commensurate deterioration of the inherent resources which may lead to further restrictions on users. Alternative 5 would be expected to result in all of the same Class I recreation impacts identified for the proposed project.

The proposed project is also judged to result in beneficial impacts (Class IV) to recreation associated with the Open Space Rezone and access improvements. The same beneficial impact would be attributable to Alternative 5.

6.2.5.2.10 Cultural Resources. Although no known cultural resources exist at the project site, grading activities associated with site development of the residential area, however limited, and/or recreational facilities, may impact previously undiscovered cultural resources. However, incorporation of the mitigation measures identified for the proposed project would similarly be appropriate for Alternative 5. The impact of Alternative 5 on Cultural Resources is the same as for the proposed project.

6.2.5.2.11 Traffic and Circulation. Retaining the same overall residential yield of this Alternative, as compared to the proposed project, would generate virtually the same auto trips, and vehicle miles traveled, due to approximately the same number of anticipated future residents in the project area. The impact on Traffic and Circulation is judged significant and unmitigable (Class I) for the proposed project and Alternative 5.

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6.2.5.2.12 Noise. The primary noise sources for the proposed project are short-term, significant (Class I) construction noise, and potentially significant, but mitigable (Class II) traffic on Hollister Avenue during the operational phase. Since Alternative 5 would not reduce the number of residential units, construction Noise impacts which are judged significant (Class I) for the proposed project, would be the same for this Alternative. In addition, Class II operational impacts would be the same for the proposed project and this Alternative.

6.2.5.2.13 Air Quality. Retaining the same overall residential yield of this project, as proposed by Alternative 5, would result in the same impacts on air quality, due to a similar number of anticipated future residential units and residents in the project area, and correspondingly similar auto trips and vehicle miles traveled. The impact on Air Quality, which is significant and unmitigable (Class I) for the proposed project, is equivalent for Alternative 5.

6.2.5.2.14 Public Services. Since Alternative 5 would not reduce the number of residences in the project area, potential Public Service impacts, which are judged potentially significant, but mitigable (Class II) for the proposed project, would be the same for this Alternative.

6.2.6 Alternative 6: Offsite Alternative

6.2.6.1 Description of Alternative 6

This Alternative proposes approximately 54 attached townhouses and single-family-detached residences on a different site than the proposed project (i.e., not proposed Comstock Homes Development site). The alternative site for consideration is an approximately 17.4-acre property on the south side of Hollister Avenue on the northern portion of Sandpiper Golf Course (refer to Figure 6.2-4). This Alternative site is part of the Sandpiper Golf Course property and is located immediately west of the proposed Comstock Homes Development site. The existing zoning for this Alternative site is Design Residential (DR-0.1). The DR-0.1 zoning designation allows for 1 unit per 10 acres (i.e., site would need to be rezoned to allow proposed development density to occur). Since this site area is less than half the size of the proposed project, it is anticipated that the average lot sizes in this subdivision would be smaller than the lots in the proposed project. Additionally, it is assumed that the development would consist of a mix of single family detached residences and attached townhouses.

Note: development of the site identified for Alternative 6 was analyzed as a component of the Final EIR for the Sandpiper Golf Course, Clubhouse, Day Care Center, and Residential Development Project that was prepared by the Santa Barbara County Planning and Development Department (County, 1995). That Final EIR (94-EIR-9; SCH #93121097) (hereinafter referred to as the “1995 EIR”) addressed the potential impacts of three main project components: a new 54-unit townhouse style residential development on the south side of Hollister Avenue (Site I); a new 105-unit townhouse style residential development and day care center on the north side of Hollister Avenue (Site II), and the reconfiguration of five golf course holes and the renovation of the clubhouse (Site III).

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Alternative 6 (Offsite Alternative) in this EIR would occupy the 17.4-acre area of Site I which was evaluated as a part of the 1995 EIR.

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It is currently unknown if or how the applicant for the Comstock Homes Development could obtain rights to develop the Sandpiper Golf Course Site I instead of the proposed site. Selection of this Alternative (6 – Offsite Alternative) could negate the land swap and associated rezoning of Ellwood Mesa as envisioned under the proposed project.

6.2.6.2 Comparative Impacts

Following is a general description of the potential impacts of Alternative 6. Since the development yield and character of Alternative 6 is similar in scope and magnitude to the Site I impacts presented in the 1995 EIR, the conclusions of that EIR are generally reported below. These conclusions are considered to be similarly applicable to Alternative 6. Where appropriate, additional analysis is provided to address changes in baseline conditions since the 1995 EIR was prepared and/or differences in impact assessment methodology between the 1995 EIR and this EIR.

6.2.6.2.1 Geology and Geologic Hazards. The 1995 EIR concluded that “geologic processes” impacts related to the project would be significant but feasibly mitigated (Class II) for short-term erosion and changes to runoff rates. These impacts are similar to the impacts assessed for the proposed project for geology and geologic hazards. Alternative 6 would involve fewer topographic changes and less soil disturbance than the proposed project due to the substantially smaller acreage of this alternative site. Alternative 6 would require additional grading and soil disturbance beyond the residential development (Site I) to reconfigure the layout of Sandpiper Golf Course.

6.2.6.2.2 Hydrology and Water Quality. The 1995 EIR discussed potential impacts to water quality in the sections on geological processes and biological resources. The EIR concluded that water resources impacts related to the project would be significant but feasibly mitigated (Class II) for both flooding impacts and surface water quality. Similar to the proposed project, runoff from the site for Alternative 6 would flow to Devereux Creek. The Alternative 6 site encompasses areas on both sides of Devereux Creek. Potential impacts on water quality associated with Alternative 6 are similar to the proposed project, but Alternative 6 would create less impervious surface and runoff due to the smaller acreage of the site.

6.2.6.2.3 Biological Resources. The 1995 EIR concluded that biological resource impacts related to the project would be significant but feasibly mitigated (Class II) for the Devereux Creek riparian corridor and wildlife habitat disturbance and adverse, but less than significant (Class III) relative to removal of foraging areas. Residential development at the Alternative 6 (Offsite Alternative) site would result in less biological resource impacts than the proposed project with respect to eucalyptus woodlands, monarch butterfly habitat, raptor roosting/foraging habitat, Native Grasslands, and associated Environmentally Sensitive Habitat overlay areas. The 1995 EIR concluded that the project would result in significant (Class I)

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cumulative impacts on biological resources. In addition, since the 1995 EIR was prepared, red-legged frogs have been found in Devereux Creek to the north of Site I. The feasibility of the Comstock Homes developer being able to obtain rights to Site I in an exchange for development rights on Ellwood Mesa is uncertain. Therefore, Alternative 6 could negate the land exchange and establishment of the Open Space Plan area and associated coastal resource protection on Ellwood Mesa. Negating the land exchange would be considered a significant adverse impact (Class I).

6.2.6.2.4 Hazards and Hazardous Materials. The 1995 EIR concluded that Hazardous Materials/Risk of Upset impacts related to the project would be adverse, but less than significant (Class III), as related to electromagnetic forces. The Alternative 6 site has less potential for residual oil and gas development related contamination relative to the proposed Comstock Homes Development site. However, it is assumed that any residual contamination would be remediated by the Applicant prior to the construction of residential units, thus no significant effects are expected at either site. The Alternative 6 site is closer to the Venoco Ellwood Onshore Oil and Gas Processing Facility than the proposed Comstock Homes Development site. The 1995 EIR (County, 1995) concluded that impacts from risks resulting from upset conditions at the Venoco Ellwood facility (e.g., toxic hydrogen sulfide gas releases, thermal fireballs, etc.) were unlikely and less than significant (Class III), but would be additionally reduced by the adoption of an emergency response plan and the installation of H₂S gas sensors at the Golf Course's western boundary (e.g., for the residents at the site).

6.2.6.2.5 Land Use. Section 5.0 of the 1995 EIR presents a detailed analysis of the Sandpiper Golf Course project's consistency with the California Coastal Act and County's Comprehensive Plan policies. Alternative 6 is presumed to be equally consistent with these policies and the future City of Goleta General Plan. The proposed Comstock Homes Development and rezone components would be expected to balance the need for additional housing with the need for coastal resource protection and is assessed to result in a Class IV beneficial impact. Selection of Alternative 6 (Offsite Alternative) would likely negate this potential beneficial impact associated with the proposed Comstock Homes Development.

6.2.6.2.6 Agriculture. The 1995 EIR did not address agricultural impact issues. Nevertheless, it is anticipated that, similar to the proposed project, agricultural impacts of the Sandpiper Golf Course Project would be less than significant (Class III). The proposed Comstock Homes Development is assessed to have "no impact" on agriculture.

6.2.6.2.7 Mineral Resources. The 1995 EIR did not address mineral resource issues. Nevertheless, it is anticipated that, similar to the proposed project, mineral resource impacts of the Sandpiper Golf Course Project would be less than significant (Class III), due to the assumed lack of economically recoverable mineral resources within the project site.

6.2.6.2.8 Visual Resources. The 1995 EIR concluded that Aesthetic/Visual Resource impacts related to the Sandpiper Golf Course Project would be significant and unavoidable (Class I). This impact finding for visual resources applies to the proposed project as well.

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However, Alternative 6 would not adversely impact the views of recreationists entering and departing Santa Barbara Shores Park off Hollister Avenue to the extent of the proposed project.

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6.2.6.2.9 Recreation. The 1995 EIR concluded that Recreation impacts related to the Sandpiper Golf Course Project would be adverse, but less than significant (Class III). As discussed in Section 6.2.6.1, selection of Alternative 6 would likely negate the Ellwood Mesa/Santa Barbara Shores land exchange and the Open Space Plan portion of the proposed project; ultimately a portion of Ellwood Mesa could be developed under Alternative 6 (as a separate project), thereby resulting in significant, adverse impacts on recreation and biological resources. The proposed project is superior to Alternative 6 in this regard.

6.2.6.2.10 Cultural Resources. The 1995 EIR determined that the potential impact to unknown, previously undisturbed cultural resources would be adequately mitigated with pre-construction surveys and standard measures for monitoring during construction. Mitigation measures were recommended requiring stop work and analysis of resources in the unlikely event that resources were to be discovered on-site during construction. Additionally, the 1995 EIR recommended the relocation and restoration of the Barnsdall-Rio Grande Gas Station. The impacts to cultural resources associated with Alternative 6 and the proposed project are both judged potentially significant, but mitigable.

6.2.6.2.11 Traffic and Circulation. The 1995 EIR recommended a number of pre-project intersection improvements that would reduce project generated traffic impacts to less than significant (Class II), but that construction of the Hollister Avenue/US 101 interchange improvements would, in itself, result in a temporary Class I impact. However, currently, many of these improvements have been constructed, and the mitigation measures recommended in this EIR may not be feasibly implemented. The proposed project and Alternative 6 would both result in unavoidable, significant project specific and cumulative (assuming Phelps Road is not extended) traffic impacts (Class I). The impacts of Alternative 6, though, would be slightly less than those of the proposed project, given the smaller number of residential units proposed.

6.2.6.2.12 Noise. The 1995 EIR concluded that Noise impacts related to the Sandpiper Golf Course would be significant but feasibly mitigated (Class II) for short-term construction impacts. The site for Alternative 6 would be exposed to similar noise levels in comparison to the proposed Comstock Homes Development site. Construction-generated noise in Alternative 6 would be less likely to result in a significant impact to Ellwood School, and mitigation restricting the timing of construction of the easternmost homes would render impacts to less than significant (Class II), whereas the proposed project results in short-term Class I impacts.

6.2.6.2.13 Air Quality. The 1995 EIR concluded that air quality impacts related to the Sandpiper Golf Course Project would be less than significant (Class III) for ROCs and Oxides of Nitrogen. Air quality impacts for the proposed project are greater and are judged to be significant and unavoidable (Class I). However, the Class I air quality impact finding for the proposed project is due to the allowance for emissions from wood-burning fireplaces and stoves. Assuming such wood-burning devices would also be allowed under Alternative 6,

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Alternative 6 would also result in Class I air quality impacts. Exposure to odors and hazardous air pollutants (HAPs), such as potential accidental releases of hydrogen sulfide (H₂S) gas, for Alternative 6 are greater (Class II) than for the proposed project (Class III) due to Site I being closer to the Venoco Oil and Gas Processing Facility. Given recent improvements to facilities and operation of the oil and gas plant and platform, the potential for accidental HAPs releases has been lessened since the 1995 EIR was prepared. The homes in Alternative 6 would be closer to the Venoco Ellwood Onshore Facility and hence, slightly more exposed to potential odors.

6.2.6.2.14 Public Services. Since Alternative 6 slightly reduces the number of residences planned in the Goleta community, potential Public Service impacts, judged significant, but mitigable (Class II) for the proposed project, would be slightly less for this Alternative. The assumptions utilized to assess solid waste impacts for the proposed project were applied to Alternative 6 in lieu of the analysis presented in the 1995 EIR.

6.2.7 Alternative 7: Reduced Open Space Plan Alternative

6.2.7.1 Description of Alternative 7

This alternative proposes a reduced level of site improvements throughout the Ellwood Mesa Open Space Plan area compared with the base project and its variations as described in Section 3.0. This alternative assumes the following features:

- Santa Barbara Shores parcel map would be approved and the Ellwood Mesa properties and Coronado Butterfly Preserve parcels would be rezoned to Recreation as planned in the base project.
- Comstock Homes development would proceed.
- Replacement of the existing off-street parking with equivalent 20 spaces located in the same location as the proposed 40-space parking area.
- No provision for on-street or off-street equestrian parking.
- No restroom.
- No trail improvements (i.e., the designated Anza Trail would not be improved with compacted fines surfacing, defined shoulders, separate equestrian tread, etc.).
- No beach access improvements. It is assumed that existing coastal access is adequate.
- No habitat restoration.
- No remediation (unless required separately).
- No provisions for coordinated long-term management or maintenance and associated grant funding efforts.

It should be noted that some of the site improvements listed above may or may not be implemented, even under the proposed project. Many of these items are considered to be

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“opportunities” that may or may not be funded in the future. The initial improvement that is assumed to be implemented (i.e., already funded) under the proposed project consists of the Santa Barbara Shores parking lot. The other “opportunities” would be implemented over time as funding allows.

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6.2.7.2 Summary of Effects

It is difficult to quantify the effects of Alternative 7 since the extent of Open Space Plan improvements relative to “opportunities” which may or may not be implemented under the proposed project is unknown due to uncertainties regarding funding. For the purposes of this assessment, it is assumed that all of the items listed in Section 6.2.7.1. that would not occur under Alternative 7 would occur over time under the proposed project.

The reasonably expected consequences of this alternative would be continued use of the trails and coastal access points throughout the Ellwood Mesa Open Space area, with equivalent off-street parking for vehicles, and reduced on-street access for equestrians. In effect, fewer vehicles would have access to the Open Space Plan area from the Hollister Avenue trailhead, therefore, the benefits to Recreation that would have occurred from the proposed larger parking area would not occur in this alternative scenario.

Trail users entering from and returning to the Hollister Avenue trailhead would experience the same visual effects as with the base project, i.e., they would pass close to the Comstock Homes development in that portion of the Open Space Plan area. Therefore the visual impacts would not be different.

The City would control future land uses on the Ellwood Mesa properties, thus the beneficial land use impacts associated with the parcel map and the rezone would be the same as in the base project.

Potential benefits of site restoration, debris removal, infilling and management of erosional gullies, and coastal access improvements would not be realized under this alternative. The potential benefits of these proposed Open Space Plan management actions affect several disciplines including biological resources, geologic resources, water quality, hazards and hazardous materials, and recreation. Although these benefits are difficult to quantify and the existing site resources and site uses do not present an imminent risk to the resources at this time, the continued long-term unmaintained and uncontrolled use of the existing trail system, without these proposed improvements, could result in further degradation of the existing habitats and would likely result in further exacerbation of the existing problems related to coastal erosion, water quality and public safety (e.g., hazards and obstructions, unmaintained beach access). The lack of management actions would eliminate potential beneficial (Class IV) impacts, but would not necessarily result in new adverse significant (Class I or II) impacts.

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Section 6.0 Trail use could intensify as a result of efforts by the University and County of Santa Barbara to improve the existing trail system on the eastern portions of the Open Space Plan area, however
Alternatives this is speculative at this time.

6.2.7.3 Geology and Geologic Hazards

Alternative 7 would result in less ground disturbance than the proposed project associated with Open Space Plan area improvements. However, the potential benefits of the proposed Open Space Plan improvements relative to trail closures, improvements, and management would not be realized and accelerated erosion could continue to occur or increase due to a lack of trail improvement measures.

6.2.7.4 Hydrology and Water Quality

Alternative 7 would result in less ground disturbance associated with trail improvements, reduced parking lot size, no restroom, and potential remediation activities relative to the proposed project. Due to a lack of Open Space Plan area improvements, impacts to hydrology and water quality could result due to increased erosion and sedimentation, introduction of human waste into Devereux Creek, and possible introduction of contaminated soil runoff into Devereux Creek.

6.2.7.5 Biological Resources

Alternative 7 could result in adverse effects on biological resources relative to the proposed project since no habitat restoration activities would be undertaken and unabated recreationist disturbance of sensitive habitat areas would continue to occur and/or increase over time.

6.2.7.6 Hazards and Hazardous Materials

Alternative 7 could result in adverse effects on public health and the environment relative to the proposed project since residual petroleum hydrocarbon contamination and facilities on Ellwood Mesa would not be remediated and other physical hazards to recreationists would not be removed.

6.2.7.7 Land Use

Alternative 7 could result in adverse cumulative land use effects relative to the proposed project as open space usage increases over time on an unmanaged trail system.

6.2.7.8 Agriculture

Neither the proposed project nor Alternative 7 would result in any impacts on agriculture.

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6.2.7.9 Mineral Resources

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Neither the proposed project nor Alternative 7 would result in any adverse impacts on mineral resources.

6.2.7.10 Visual Resources

The proposed Open Space Plan area improvements would alter the visual appearance of some trails (e.g., Anza Trail and proposed boardwalk areas). These changes would not occur under Alternative 7. Depending on the viewer's perspective, the lack of improvements could be considered beneficial or adverse.

6.2.7.11 Cultural Resources

Neither the proposed Open Space Plan improvements planned under the proposed project (with built-in mitigation) or the lack thereof under Alternative 7 would be expected to adversely impact cultural resources.

6.2.7.12 Traffic and Circulation

Neither the proposed project or Alternative 7 are expected to have any adverse effects on traffic or circulation relative to Open Space Plan improvements. However, Alternative 7 would not provide the same level of parking provided by the proposed project.

6.2.7.13 Noise

Neither the proposed project nor Alternative 7 would be expected to result in any long-term noise impacts relative to Open Space Plan improvements, or lack thereof.

6.2.7.14 Air Quality

Neither the proposed project nor Alternative 7 would be expected to result in any long-term air quality impacts relative to Open Space Plan improvements, or lack thereof.

6.2.7.15 Public Services

The proposed project includes a plan to provide a restroom at the parking lot south of Hollister whereas Alternative 7 does not. Alternative 7 would maintain the status quo whereas the proposed project would provide an amenity that does not currently exist.

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Section 6.0 **6.3 CONSISTENCY OF ALTERNATIVES WITH PROJECT OBJECTIVES**

Alternatives

6.3.1 Introduction

The “project objectives” are discussed in Section 1.3 of this EIR. This section of the alternatives analysis assesses the ability of the proposed project and the seven alternatives under consideration to feasibly meet the project objectives.

The key project objectives that are pertinent to this analysis are:

- Shift existing private development rights (Santa Barbara Development Partnership [SBDP]) within the jurisdiction of the City of Goleta from privately-owned coastal mesa habitat and open space to less environmentally sensitive City of Goleta-owned park property (Santa Barbara Shores Park) through a property exchange and/or through the purchase of development rights. This exchange would increase the size of Santa Barbara Shores Park from approximately 116.16 to 216.78 acres and designate the entire park as permanent open space.
- Associated with the shift of development rights to the north and away from the coast, allow some level of residential development of the Comstock Homes Development site (up to 78 residential units, maximum) on a 36-acre portion of the existing City of Goleta 116.16-acre Santa Barbara Shores Park that is directly south of Hollister Avenue. For the purposes of the EIR analysis, the actual number of residential units (up to a maximum of 78) needed to meet the residential component objective is dependent, in part, on the developer’s need to make a reasonable return on the investment to justify the property exchange.
- Maintain and improve passive enhanced open space recreation opportunities and preserve and restore environmentally sensitive habitat in the portions of the proposed Open Space Plan area under the City’s jurisdiction, in coordination with the University and the County.

Details of the proposed residential, land use, and open space projects are provided in Sections 2.0 and 3.0.

The above listed objectives, if met, would help provide badly needed housing; protect valuable coastal open space from encroachment; restore sensitive habitats; and improve recreational opportunities for City residents.

6.3.2 Consistency Analysis

The tabular summary presented in Table 6-2 shows that the proposed project and Alternatives 2, 3, 4, 5, and 7 are potentially capable of meeting most of the project objectives. Alternatives 1 and 6 are deemed incapable of meeting the stated project objectives. Both Alternatives 1 and 6 would not allow the land exchange to occur which would shift development rights to the north away from the coast (i.e., Ellwood Mesa) nor would they ensure preservation of environmentally sensitive habitat on Ellwood Mesa.

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Table 6-2. Consistency of Alternatives with Project Objectives

Section 6.0

Alternatives

Alternative	Ability of Alternative to Meet Stated Objective		
	Shift Development Rights from Ellwood Mesa to Less Sensitive Location	Allow for Adequate Level of Residential Development to Meet Demand/Needs	Enhance/Preserve Open Space
Proposed Project	High	High	High
Alternative 1	Doesn't meet objective	Low	Doesn't meet objective
Alternative 2	High	Moderate	High
Alternative 3	High	Moderate	High
Alternative 4	High	Moderate	High
Alternative 5	High	Moderate	High
Alternative 6	Doesn't meet objective	Moderate	Doesn't meet objective
Alternative 7	High	High	Moderate

6.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The proposed project and all seven alternatives considered would result in varying levels of significant, unmitigable impacts (Class I) to Biological Resources and/or Visual Resources. Additionally, all alternatives considered (including the proposed project) would result in Class I impacts to Recreation. The proposed project and Alternatives 2 through 7 would all result in varying degrees of significant, unmitigable impacts to Noise, Air Quality, and Traffic and Circulation.

The proposed project and Alternatives 2, 3, 4, 5, and 7 would result in a beneficial impact (Class IV) associated with regional land use planning relative to the need for additional housing and the need for coastal resource protection.

Alternative 1 (No Project Alternative) would not meet most of the project objectives (refer to Section 6.3), and would result in Class I impacts to biology and visual resources associated with the assumed five dwellings and associated infrastructure on Ellwood Mesa. Alternative 1 would also negate the land exchange and associated coastal resource protection.

Alternative 6 (Offsite Alternative) would result in less Class I biological impacts than the proposed project and Alternatives 1 through 5 and 7. However, Alternative 6 is not capable of meeting the project objectives (refer to Section 6.3). Additionally, the feasibility of developing Alternative 6 (Offsite Alternative), which is a part of the Sandpiper Golf Course property is currently unknown given the lack of site control by the Applicant and the City of Goleta.

Alternative 7, Reduced Open Space Alternative, is considered to be capable of meeting the project objectives, but it would potentially result in less protection and enhancement of sensitive resources and public safety in the Open Space Plan area than the proposed project and Alternatives 2, 3, 4, and 5. Alternative 7 would also result in more Class I biological impacts at

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Section 6.0 the Comstock Homes Development site than Alternatives 2, 3, 4, and 5, since it would not avoid
Alternatives the eucalyptus woodland/monarch butterfly ESHA on the southwest border of the site.

The proposed project and Alternatives 2, 3, 4, 5, and 7 are capable of meeting the project objectives. Alternatives 2, 3, 4, and 5 would result in less Class I biology impacts than the proposed project.

Alternative 3 would avoid impacts to Drainage A1 and the associated wetland area and riparian buffer that would be affected by the proposed project and Alternatives 2, 4, 5, and 7 on the northeast portion of the site. Alternative 3 would also have less visual impacts and less impact on Open Space Plan users than the proposed project and Alternatives 2, 4, 5, and 7 since the seven-lot cul-de-sac development (and associated span bridge over Drainage A1) would not be constructed on the northeast portion of the Comstock Homes Development site south of Hollister.

Alternative 5 is similar to the proposed project and Alternatives 2, 4, and 7 except that it would avoid impacts on six isolated Native Grassland areas in the south-central portion of the site.

Of the alternatives considered capable of meeting the project objectives, Alternatives 3 and 5 would result in the least impacts on biological resources. Alternative 3 would result in less visual impacts than Alternative 5 and would also result in less impact on the “experience” of recreationists accessing the Open Space Plan area via Hollister Avenue and the new parking area that would be constructed. Although Alternative 3 would impact the isolated Native Grassland areas on the site, it would avoid directly impacting the riparian area/wetland associated with the road/bridge crossing of Drainage A1 associated with Alternative 5.

Based on the considerations summarized above, Alternative 3 is considered to be the Environmentally Superior Alternative.